

EM-104 ECC/ECO SEMINAR

4 FEBRUARY 2016


OVERVIEW

This seminar was created to provide ECC/ECOs an overview of what their positions entails. This IS a seminar so there is not a test at the end of the course. The way you will be evaluated is through your actions as your MSC/UNIT's ECC/ECO.

As this is a seminar, at anytime throughout, if you have questions relating to your MSC/UNIT's environmental program PLEASE ask those questions as they may apply to other units as well.



WHAT WILL BE COVERED

- ☐ ECC/ECO RESPONSIBILITIES
 - ☐ OVERVIEW OF THE ECE PROGRAM
 - ☐ PREPARATION FOR YOUR ECE
 - ☐ THE ECE (WHAT DO WE LOOK FOR?)
 - ☐ CORRECTIVE ACTIONS
 - ☐ COMMON DEFICIENCIES
 - ☐ PREPARATION FOR UNIT DEPLOYMENT
 - ☐ NOTICE OF ENVIRONMENTAL NONCOMPLIANCE
 - ☐ QUESTIONS
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ECC RESPONSIBILITIES

MCIEAT-MCB CAMLEJO 5090.9 (4.15.a) states that:

“ECC Shall Serve as the point of contact (POC) for matters involving environmental issues and compliance with this Order..... Ensure all commands within their cognizance adhere to the ESOPs.”

MCIEAST-MCB CAMLEJO 5090.9 (4.15.a-m) – Identifies what the ECC shall do.

MCIEAST-MCB CAMLEJ Bbul 5090.2 identifies ESOP 4.1 Environmental Compliance Coordinator (ECC) Responsibilities.

All individuals that are appointed as ECCs need to review the requirements in the above listed order and ESOP to familiarize themselves with ALL of their required duties as directed by the order.

The unit ECO needs to review these requirements to familiarize themselves with what support that they are supposed to receive from their ECCs.



ECO RESPONSIBILITIES

MCIEAT-MCB CAMLEJO 5090.9 (4.17.a) states that:

“ECOs shall: Serve as the unit/department POC for matters involving environmental issues and compliance with this order.”

MCIEAST-MCB CAMLEJO 5090.9 (4.17.a-n) – Identifies what the ECOs shall do.

MCIEAST-MCBCAMLEJ Bbul 5090.2 identifies ESOP 4.2 Environmental Compliance Officers (ECO) Responsibilities.

All individuals that are appointed as ECOs need to review the requirements in the above listed order and ESOP to familiarize themselves with ALL of their required duties as directed by the order.

The MSC ECC needs to review these requirements to familiarize themselves with what duties their ECOs are required to do.



OVERVIEW OF THE ECE PROGRAM

MCO P5090.2A Ch. 3 (Chapter 4 Section 4104) States:

“All Marine Corps installations shall participate in the ECE Program. Evaluations conducted under the ECE evaluate compliance with all environmental program requirements and will include all operations and activities within the installation boundary. Evaluations will include tenant activities, out grants, leases, and other activities under the purview of the United States Marine Corps. This program includes self-evaluations of installation programs with environmental requirements, evaluations of installation commands and tenants, and an HQMC oversight Benchmark ECE program.”



OVERVIEW OF THE ECE PROGRAM CONT.

MCIEAST-MCB CAMLEJO 5090.9 (4.4.b)

“Head of Environmental Compliance Branch Shall: perform(s) environmental compliance evaluations of the environmental activities aboard MCIEAST-MCB CAMLEJ to determine and improve the status of compliance with Federal, State, and Marine Corps environmental laws.”

MCIEAST-MCB CAMLEJO 5090.9 (4.13)

“Tenant Commanders shall: Ensure all organizational elements within each comply with the requirements of this Order.”

MCIEAST-MCB CAMLEJO 5090.9 (4.15.e)

“Schedule and participate in the environmental compliance evaluations and corresponding follow-up of organization/command operations per this Order....”



OVERVIEW OF THE ECE PROGRAM CONT.

The ECE Program is intended to evaluate the overall environmental compliance of an organization/unit per the references above. This is an EVALUATION not an inspections. This means that the intent is to bring those identified as out of compliance back in to compliance. While we are evaluating your compliance we are also using this evolution as a training tool to assist ECC/ECOs.

WE DO NOT GET PAID BY THE DEFICIENCY!!!!



PREPARATION FOR YOUR ECE

Here are some tools to assist you in having a successful ECE:

- ☐ Ensure that you are aware of when your organization/units scheduled ECE is.
 - ☐ Schedules are created with coordination from MSC ECCs.
 - ☐ We try to schedule six months from your previous ECE.
- ☐ ECCs should conduct a walkthrough at least two weeks prior to the ECC .
- ☐ Ensure you conduct your weekly turn-in prior to the ECE. If the ECE falls before your regularly scheduled turn-in day, coordinate through your ECC to see if you can have a pick-up scheduled prior to the ECE.
- ☐ Have all your administrative records available and easily accessible. (YOU SHOULD NOT HAVE TO SEARCH FOR THEM THE DAY OF THE INSPECTION.)
- ☐ Ensure you have personnel available, with keys if necessary, at all of your sites to allow for ease of access. (We should not have to search for the PFC with the only set of keys.)

PREPARATION FOR YOUR ECE CONT.

Here are some tools to assist you in having a successful ECE (Cont.):

- ☐ Ensure that your Command is aware of the ECE, it should not be a shock that they are being evaluated
- ☐ Coordinate an inbrief with your command, if they require one.
- ☐ It is mandatory that an outbrief be conducted at the conclusion of the ECE. Ensure that you know who the outbrief will be with, this individual must be designated by the Commanding Officer/Director to receive the outbrief.
- ☐ Be Honest during the ECE,.
- ☐ If you have questions why something is a deficiency ask, make us tell you why.
- ☐ Take notes.



THE ECE

The ECE is a comprehensive “look” at your organization/unit’s entire environmental program.

Deficiencies are broken down into three categories:

- ❑ Findings – A violation of a Federal or State regulation. This is a discrepancy, if found by a Federal or State Regulator, could have potentially cause the Base to receive a Notice of Violation (NOV) which could lead to a monetary fine.
- ❑ Discrepancy – A violation of a NAVFAC, HQMC, MCICOM, MCIEAST, or ESOP regulation. These deficiencies, while initially are not Findings, could potentially lead to a Finding if not corrected.
- ❑ Command Issue – This is a Finding or a Discrepancy that is identified at a majority of listed sites throughout the Command.



THE ECE CONT.

ENVIRONMENTAL COMPLIANCE EVALUATION (ECE)												
SUMMARY SHEET												
Command:						ECC:						
Unit:						ECE Date:						
ECO:						Inspected By:						
SUMMARY OF FINDINGS												
FINDINGS: DISCREPANCIES: COMMAND ISSUES: REPEATS:												
BLDG#:	BLDG USE:	ECC:	ECO:	EMS:	RECYC/SW:	HM:	HW:	MW:	AST:	OVS:	SPCC:	AIR:
		F-	F-	F-	F-	F-	F-	F-	F-	F-	F-	F-
		D-	D-	D-	D-	D-	D-	D-	D-	D-	D-	D-
		R-	R-	R-	R-	R-	R-	R-	R-	R-	R-	R-
		F-	F-	F-	F-	F-	F-	F-	F-	F-	F-	F-
		D-	D-	D-	D-	D-	D-	D-	D-	D-	D-	D-
		R-	R-	R-	R-	R-	R-	R-	R-	R-	R-	R-
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		R-	R-	R-	R-	R-	R-	R-	R-	R-	R-	R-
Command Issue												
Key Terms: ECC: Environmental Compliance Coordinator ECO: Environmental Compliance Officer EMS: Environmental Management System RECYC/SW: Recycling/Solid Waste Management HM: Hazardous Material Management		HM: Hazardous Waste Management MW: Medical Waste Management AST: Above Ground Storage Tank OVS: Oil and Water Separator SPCC: Spill Prevention, Controls, and Countermeasures Air: Air Quality Management				(F) - Finding: Violation of Federal or State Law or regulation found at this location. (D) - Discrepancy: Violation of MCO or MCIEAST-MCBO found at this location. (CI) - Command Issue: Violations found at multiple sites throughout the command		(R) - Repeat: Same deficiency found from previous half ECE Corrective action letter is due back to EMD 30 days upon receipt of this report. N/A - Not Applicable - is given in those media areas that are not present at that specific location.				

THE ECE SUMMARY SHEET

THE ECE CONT.

SEMI-ANNUAL ENVIRONMENTAL COMPLIANCE EVALUATION									
Date:		Command:					ECC:		
Inspector:		Applicable Buildings:					ECO:		
ECC	Status				Comment	References	Corrective Action		
	Yes/No	F	D	R					
1) Has the ECC ensured that the unit ECO has been appointed in writing by the unit CO? Does the Appointment letter have a written description of their duties? Has the ECO signed their training record?						MCIEAST-MCB CAMPLEJO 5090.9 (4.b.15.d)	ECC needs to ensure that each command has a appointed ECO. The appointment letter needs to be signed by the unit ECO, or someone with by direction authority of the unit CO. A written appointment letter needs to be signed no later than two weeks after verbal appointment. There needs to be a written description of the ECO's duties in the appointment letter. ECO needs to signee their training record on appointment to the ECO position.		
2) Is the ECC present at the unit ECE?						MCIEAST-MCB CAMPLEJO 5090.9 (4.b.15.e)	ECC, or AECC, are required to be present at the unit ECEs.		
3) Has the ECC assisted the unit in developing corrective action for deficiencies identified during the unit's ECE?						MCIEAST-MCB CAMPLEJO 5090.9 (4.b.15.f)	ECC is responsible for assisting the unit in developing corrective actions for any identified deficiencies found during the unit's ECE. The ECC is responsible for providing the corrective actions to EMD within 30 days of receipt of the ECE report.		
4) Has the ECC conducted quarterly ECC inspections, to include recycling/solid waste areas, and ensured the identified deficiencies are corrected?						MCIEAST-MCB CAMPLEJO 5090.9 (4.b.15.h.7)	ECC must conduct four documented ECC quarterly inspection, but may use one EMD conducted ECE to satisfy one quarter requirement. ECC must ensure that any deficiencies they identify during their quarterly are corrected. ECC's must incorporate inspection of their solid waste and recycling areas into their quarterly environmental inspections. For recycling issues, contact the Recycling Office at 451-4214. For solid waste issues, contact the Landfill Clerk at 451-2940.		
5) Is the ECC ensuring that unit ECOs are attending required training?						MCIEAST-MCB CAMPLEJO 5090.9 (4.b.15.i)	ECC must ensure that the unit ECO has attended required training 90 days after being appointed.		
6) Did the ECC follow the ESOP for Environmental Management Preparations for Deploying Units on the unit's last deployment?						MCIEAST-MCB CAMPLEJO 5090.9 (4.b.15.k)	ECC must ensure that the unit follows procedures in the ESOP for Environmental Management Preparations for Deploying Units.		
7) Has the ECC provided EMS training to unit ECOs and provided them with guidance on how to train unit level personnel?						MCO 5090.2A CH.2 Chapter 2 17 Elements of EMS			
8) Has the ECC monitored the progress of removal of HM/HW/MW on a weekly basis and have copies (or access to copies, of HM/HW turn-ins for the preceding 12 months?						MCIEAST-MCB CAMPLEJO 5090.9 (4.b.15.h.4&5)	ECC needs to ensure that unit is conducting turn in, that they are signing the turn in documents and forwarding them to EMD, and that turn in records are retained for preceding 12 month period. ECC can rely on the ECO to retain records. But if records are not maintained at the unit level this is a deficiency.		
Balanced Score Card Totals		0	0	0					

THE ECE CHECKLIST

THE ECE (CHECKLIST)

The ECC Checklist is used to evaluate the ECC. There are eight questions on the ECC checklist. Any deficiency that is identified on the checklist will be levied as a discrepancy only and the ECO should elevate them to his command. These discrepancies could potentially show that the ECC is not supporting their units as required.

What do we look for:

1. Has the ECC ensured that there is an appointed ECO?
2. The ECC is present at the ECE.
3. They assist in developing corrective action from any identified deficiencies.
4. Are they conducting their quarterly inspections as required?
 - They must conduct at least three, with one Base ECE counting as the fourth.
5. Are the ECCs ensure that ECOs attend the required training?
6. Did the ECC assist the unit in preparing for deployment?

THE ECC (CHECKLIST) CONT.

ECC Checklist Cont.:

7. Has the ECC provided training on the Environmental Management Systems (EMS)?
8. Has the ECC assisted in weekly HM/HW/MW turn and are they ensure that 12 months of records are kept?

The ECO Checklist is used to evaluate the ECO. There are 20 questions on the ECCO checklist. Any deficiency that is identified on the checklist will be levied as either a finding or a discrepancy depending on the regulatory violation. These violations could potential show a breakdown in the unit's environmental program.

1. Has the ECO developed SOPs for the unit:
 - Must include steps for HM/HW minimization.
 - Must have all Orders and ESOPs that apply to the command, may be electronic.
 - Must have a POC roster and it must be submitted to the ECC monthly.



THE ECE (CHECKLIST) CONT.

ECO Checklist Cont.:

2. Has the ECO appointed all personnel in writing two weeks after verbal appointment?
3. Are all ESOPs up-to-date and available for review for all unit personnel?
4. Is there a numerical list of all environmental associated sites?
 - Must be updated semi-annually, or as sites are added or removed.
 - Must be by building number.
5. Are there locations maps?
6. Has the ECO conducted documented monthly inspections?
 - Must use MCIEAST-MCB CAMLEJ EMD Form 26
 - Must document corrective actions.
7. Has the ECO ensured that the command is participating in weekly turn-in?
 - Must use MCIEAST-MCB CAMLEJ EMD Form 16

THE ECE (CHECKLIST) CONT.

ECO Checklist Cont.:

8.Environmental Training Program

- Personnel Trained
- Documented on MCIEAST-MCB CAMLEJ EMD Form 27
- Training records signed.
- Historical training records closed.

9.Reporting all spills to 911 and documenting on MCIEAST-MCB CAMLEJ Form 18

10.Was the ESOP for the Preparation for Deploying forces followed?

11.Has the ECO developed an AUL?

12.Is the ECO Conducting quarterly service life inspections?

13.This questions applies to units with HW sites?



THE ECE (CHECKLIST) CONT.

ECO Checklist Cont.:


14. Only approved checklists are used and kept for three years?
15. Documented training for personnel who use wash racks and OWS?
16. Is the Unit Level Contingency Plan (ULCP) up to date?
17. Does the ULCP have all the required information?
18. Has EMS training been provided to unit personnel?
19. Has environmental awareness training been provided to unit personnel?
20. Does the ECO have a unit EMS plan that include:
 - Location of ESOPS
 - Who the ECC is?
 - Who the ECO is?
 - Who to talk to for answers to environmental questions?
 - Awareness of the CGs Environmental Policy Statement and location?
 - Work practices and aspects.

THE ECE (CHECKLIST) CONT.

Recycling/Solid Waste Checklist is used to evaluate the organization/units overall compliance with the recycling and solid waste orders. This checklist has two questions.


1. Is solid waste being managed correctly?
2. Is the unit participating the qualified recycling program?

Hazardous Material Checklist is used to evaluate the organization/units compliance with hazardous material regulations. There are only four questions on this checklist. A finding or a discrepancy can be levied depending on the severity of the violation.

1. HMs must be managed properly?
 2. There must be MSDS available for all HMs the unit uses.
 3. Primary and Secondary containers must be labeled properly.
 4. Are all containers in serviceable condition and stored correctly?
- 

THE ECE (CHECKLIST) CONT.

The Medical Waste checklist is used to evaluate the units compliance with Naval Hospitals Medical Waste program. This checklist has eight questions. Discrepancies or Findings may be levied depending on the severity of the discrepancy.

1. There must be an SOP for the management of MW.
 2. Personnel managing MW, to include the ECO , must have documented blood borne pathogen training.
 3. MW must be collected and segregated correctly.
 4. Transportation of MW must be documented on the approved form.
 5. MW must only be transported to an approved MW site.
 6. Must be transported immediately upon closure of the container.
 7. Bio-hazard bags and sharps containers must not exceed $\frac{3}{4}$ full.
 8. Must have a ULCP that mentions MW specific requirements.
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THE ECE (CHECKLIST) CONT.

The Above Ground Storage Tank (AST) checklist is used to evaluate the units overall compliance with the AST program. Findings or discrepancies may be levied depending on the severity of the deficiency. This checklist has five questions.

1. Tank and piping must be in good condition.
2. Is the tank's foundation or base providing appropriate support?
3. Are weekly inspections being conducted?
4. Are drainage events being documented on the weekly inspection form?
5. Is the tank marked appropriately?


THE ECE (CHECKLIST) CONT.

The Oil and Water Separator (OWS) checklist is used to evaluate the overall compliance with the OWS program. Depending on the severity of the deficiency a finding or a discrepancy can be levied. This checklist has seven questions.

1. Required signage must be posted.
2. Must be documented training for all personnel utilizing the OWS.
3. There must be a daily inspection record of all operational days.
4. Must be less than two inches of oil floating on the service of the OWS.
5. OWS, any thing associated with the OWS, must be free from debris.
6. Only EMD approved low emulsifying soaps may be used.
7. Nothing may be stored on wash racks, wash pads, or adjacent floor drains.

THE ECE (CHECKLIST) CONT.

The Spill Control and Countermeasures (SPCC) checklist is used to evaluate compliance in regards to SPCC. Depending on the severity of the deficiency, a finding or a discrepancy can be levied. There are five questions dealing with SPCC.

1. Proper secondary containment for containers of HM equal to or greater than 55 gallons.
 2. Is secondary containment in good condition?
 3. Are best management practices (BMP) being taken to prevent releases to the environment?
 4. Are weekly inspections being conducted on all secondary containment areas, are they documented?
 5. Is there documentation of drainage events from secondary containment areas?
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THE ECE (CHECKLIST) CONT.

Title V (Air Quality) checklists are used to evaluate an organization/units overall compliance with MCB Camp Lejeune's Title V Permit. There are multiple checklists and it is dependent on what Title V source an organization/unit has as to how many are used. Each checklist has different requirements, but there are requirements that are universal over all Title V checklist. They are:

1. All ECOs ,and those responsible for operating and entering data, must go through EM-106 (Air Quality Training).
2. Records must be turned in 1 January and 1 July of each year.
3. A Title V binder must be present that contains a unit specific SOP, Title V Permit, and Air Quality Base Order.
4. Records must be retained on site for the current year and previous two reporting periods.



CORRECTIVE ACTIONS


Corrective actions are what steps your organization/unit have taken to identified deficiencies on the ECE report. Some corrective actions are simple, some may take time due to work requests, and some may be ongoing like training.

When the report is sent electronically to the MSC identified P.O.C, a organization/unit has 30 days to submit a signed corrective action letter back to EMD. The corrective action letter must be signed by the Commanding Officer/Director, or someone with by direction authority as designated by the Commanding Officer/Director.

The ECC is required to assist in the corrective action process and should ensure accuracy of the corrective actions before the letter is submitted. Remember your Commanding Officer/Director's name is on the letter.

If more time is needed, contact your ECC to have them request an extension. Don't wait if more time is needed, requests for extensions the day the letter is due may be too late!!!

In some situations, EMD may come back out and re-inspect. In most instances they will look during the next half's ECE.



COMMON DEFICIENCIES

Throughout all ECEs, some of the most common deficiencies are

- Missing, or not signed, training records.
- Missing, or not documented, ECO monthly inspections.
- Not documenting deficiencies or corrective actions on ECO/ECC inspections.
- Using the incorrect forms.
- Not conducting turn-in as required.
- Expired service-life.
- Missing service-life labels.
- Not inspecting secondary containment areas.
- Not documenting OWS training.
- Units are not participating in the recycling program.
- Co-mingling of solid waste and_____.




COMMON DEFICIENCIES CONT.

- Not instituting BMPs.
- Not keeping wash racks clean and free of trash and debris.



PREPARATION FOR UNIT DEPLOYMENT

Every ECE cycle, a large amount of deficiencies are issued to units who returned from deployment due to missing records. ESOP 4.9 Environmental Management Preparations for Deploying Units is a step-by-step guide on what is to be done to prepare a unit for deployment and what to do upon return. Some key elements of this ESOP are:

- Identify if there is going to be operations conducted while the unit is deployed.
 - If the unit is operational, who in the RBE will be trained and will be responsible for the environmental program.
 - If there is no operation, or there will be no RBE, who will the unit turn their records over to?
 - At no time will the Environmental Records go with the unit on deployment.
 - Upon return, identify what personnel will be responsible for the program and get them trained.
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NOTICE OF ENVIRONMENTAL NONCOMPLIANCE

A Notice of Environmental Noncompliance is given when an issue has arisen that has to be officially documented. The Notice is usually issued to the overall individual in charge of the organization/unit. Many of the reasons that notices are issued are due to negligence of published regulations. The notices have a 30 day corrective action response time. Notices are issued by the MCIEAST-MCB Camp Lejeune Commanding General, signed by direction from the director of EMD or the AC/S of G-F. Some of the most common reasons for a Notice to be given are:

- Knowingly releasing materials that can cause a negative impact to the environment.
- Knowingly disregarding published regulations.
- Violation of a regulation that causes a Notice of Violation or fine.
- Knowingly disposing of HM/HW/MW in a manner not established by published guidelines.
- Knowingly disposing of anything, other than stormwater, into stormwater conveyance systems.



NOTICE OF ENVIRONMENTAL NONCOMPLIANCE CONT.

In all instance where a Notice of Noncompliance is issued, an investigation is conducted to identify root cause. The term “knowingly” does not necessarily mean that the individual perpetrating the action is aware, if leadership in charge are aware. Just having a spill does not warrant a Notice, the manner in which the spill occurred is looked in when they are large in size. All things are taken into account when the investigation is being conducted.

